

VSL Criteria Strawman Document

The VSL “definitions” form the overall basis for the criteria to be used to assign VSLs to each requirement. These definitions are as follows:

Lower	Moderate	High	Severe
The responsible entity is mostly compliant with and meets the intent of the requirement but is deficient with respect to one or more minor details	The responsible entity is mostly compliant with and meets the intent of the requirement but is insufficient with respect to one or more significant elements.	The responsible entity has only partially achieved the reliability objective and is missing one or more significant elements	The responsible entity has failed to meet the reliability objective of the requirement

These definitions provide general, overall guidance for developing VSL criteria for categories of requirements.

- A. **Procedure/Program:** The following general criteria should be used to develop violation severity levels for standards requirements that direct the responsible entity to have or use an executable program, procedure, protocol or written guideline document.

Lower	Moderate	High	Severe
The responsible entity has demonstrated the existence of the required procedure/program but is missing minor details or minor program/procedural elements. Such deficiencies would not impact the achievement of the objective of the requirement.	The responsible entity has demonstrated the existence of the required procedure/program and is mostly compliant but missing one or more significant elements while meeting the objective of the requirement.	The responsible entity has demonstrated the existence of the required procedure/program but it is missing several significant elements which would cause the entity to only partially meet the objective of the requirement.	The responsible entity has failed to demonstrate the existence of the program, procedure, protocol, or guidance document required.

Example:

FAC-003-1 Requirement # 1

The Transmission Owner shall prepare, and keep current, a formal transmission vegetation management program (TVMP). The TVMP shall include the Transmission Owner’s objectives, practices, approved procedures and work specifications.

Lower	Moderate	High	Severe
A TVMP has been developed but the TVMP has minor administrative weaknesses (e.g. not fully current, not approved in timely fashion,	A TVMP has been developed but is missing one or more significant elements (objectives, only includes partial set of work specifications, etc.)	A TVMP exists but missing significant elements (practices, procedures, specifications) which would prevent the entity from substantially meeting the reliability objectives of the requirement.	The responsible entity has not developed a TVMP.

B. Implementation/Execution: The following general criteria should be used to develop violation severity levels for standards requirements that direct the registered entity to implement or execute a program, procedure requirement, or directives.

Lower	Moderate	High	Severe
The responsible entity’s implementation/execution has resulted in meeting the intent of the requirement but the execution was deficient with respect to minor details.	The responsible entity’s implementation has resulted in the entity being mostly compliant but the execution was insufficient with regard to one or more significant elements	The responsible entity has implemented the requirement but significant execution failures have occurred that prevented the entity from substantially meeting the objectives of the requirement.	The responsible entity has failed to demonstrate implementation or execution of the program/procedure requirement or directive

Example:

FAC-003-1 Requirement 1.3

All personnel directly involved in the design and implementation of the TVMP shall hold appropriate qualifications and training, as defined by the Transmission Owner, to perform their duties.

Lower	Moderate	High	Severe
Administrative program weaknesses in execution of the training /qualification program.	The responsible entity failed to adhere to <u>either</u> its training or qualifications standards	The responsible entity has failed to adhere to its training <u>and</u> qualification standards resulting in potentially unqualified personnel assigned to administer the TVMP program.	The responsible entity has not defined qualification and training requirements and personnel directly involved in the TVMP do not hold qualifications or training

C. **Reporting:** The following general criteria should be used to develop violation severity levels for standards requirements that direct the entity to report operational information and/or data to another registered entity or regulatory authority.

Lower	Moderate	High	Severe
The responsible entity provided the required reports with minor exceptions but substantially meets the intents of the requirement	The responsible entity provided the required reports with some deficiency, but was mostly compliant with the directives of the requirement	The responsible entity provided the required reports but was significantly deficient in effectively meeting the objectives of the requirement.	The responsible entity has failed to report the operational information or data as directed by the requirement

Example:

D. **Coordination/Communicate:** The following general criteria should be used to develop violation severity levels for standards requirements which direct the registered entity to coordinate and/or communicate with other required entities.

Lower	Moderate	High	Severe
The responsible entity has coordinated/communicated	The responsible entity has coordinated/communicated	The responsible entity has coordinated/communicated	The responsible entity has failed to

with others with minor exception and is substantially compliant with the directives of the requirement	with others with some exception and is mostly compliant with the directives of the requirement	with others but was substantially deficient in meeting the directives of the requirement	coordinate/communicate with others as directed by the requirement
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Example:

E. Numeric Performance: The following general criteria should be used to develop violation severity levels for standards which require the responsible entity to meet a defined performance numeric level:

If appropriate, use the quartile approach:

Lower	Moderate	High	Severe
<p>1st quartile</p> <p>The responsible entity has failed to meet the minimum acceptable performance of the requirement but has achieved a performance level of 75th percentile of the appropriate measure</p>	<p>2nd quartile</p> <p>The responsible entity has achieved the measure of performance level below or equal to the 75th percentile but above the 50th percentile of the appropriate measure</p>	<p>3rd quartile</p> <p>The responsible entity has achieved the measure of performance level below or equal to the 50th percentile but above the 25th percentile of the appropriate measure</p>	<p>4th quartile</p> <p>The responsible entity has achieved the measure of performance level below or equal to the 25th percentile of the appropriate measure</p>

Violation severity levels for **Numerical Requirements** will be divided into quartiles as described below:

- **Lower:** $75\% \leq \text{Normalized Score} < 100\%$.
- **Moderate:** $50\% \leq \text{Normalized Score} < 75\%$.
- **High:** marginal performance or results — $25\% \leq \text{Normalized Score} < 50\%$.
- **Severe:** $0\% \leq \text{Normalized Score} < 25\%$.

For example, Requirement 6 of BAL-002-0 requires an RSG or BA to restore its contingency reserve within 90 minutes following activation of reserves. If the BA/RSG required contingency reserves are 100 MW (this is set by the BA or RSG), the following VSL would apply if the available contingency reserves after 90 minutes were:

Lower: $75 \text{ MW} \leq \text{Normalized Score} < 100 \text{ MW}$

Moderate: $50 \text{ MW} \leq \text{Normalized Score} < 75 \text{ MW}$

High: $25 \text{ MW} \leq \text{Normalized Score} < 50 \text{ MW}$

Severe: $0 \text{ MW} \leq \text{Normalized Score} < 25 \text{ MW}$

- Lower: $0 < \text{missed sub-requirements} \leq 5$
- Moderate: $5 < \text{missed sub-requirements} \leq 10$
- High: $10 < \text{missed sub-requirements} \leq 15$
- Severe: $15 < \text{missed sub-requirements} \leq 2$

F. **Multi-Component:** The following general criteria should be used for multiple component requirements which requires the responsible entity to comply with a multiple number of sub-requirements or sub-sub-requirements.

Lower	Moderate	High	Severe
The responsible entity failed to comply with up to 25% of Sub-Components	The responsible entity failed to comply with more than 25% up to 50% of Sub-Components	The responsible entity failed to comply with more than 50% up to 75% of Sub-Components	The responsible entity failed to comply with more than 75% of Sub-Components

G. **Explanatory Text:** A requirement which provides explanatory text but does not require action on the part of the entity.

Lower	Moderate	High	Severe
All explanatory Requirements that have a risk factor assigned to them shall have a VSL of Lower	N/A	N/A	N/A

assigned to them			
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H Requirements without Violation Risk Factor Assigned: for those requirement that do not have a Violation Risk Factor assigned to them it is not necessary to assign a VSL

Other/Miscellaneous A unique requirement which can not be placed in any of the other assigned categories
As a default the basic definitions for each of the 4 basic definitions of levels of VSL will be used to assign VSL to the requirements that fall in this category.